

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Southwest Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Vaughan-Bassett Furniture Company, Inc.
Vaughan-Bassett Plant #2
307 South Railroad Avenue
Galax, Virginia
Permit No. SWRO10332

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Vaughan-Bassett Furniture, Inc. has applied for a Title V Operating Permit for its Galax Plant #2 facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact: W. Michael Gregory Date: 1/4/2016
W. Michael Gregory
276-676-4834

Air Permit Manager: Rob Feagins Date: 1/5/2016
Rob Feagins

Regional Director: Allen J. Newman, D.E. Date: 1/5/2016
Allen J. Newman, D.E.

FACILITY INFORMATION

Permittee

Vaughan-Bassett Furniture Company, Inc.
300 East Grayson Street
Galax, VA 24333

Facility

Vaughan-Bassett Plant #2
307 South Railroad Avenue
Galax, VA 24333

County-Plant Identification Number: 51-640-00036

SOURCE DESCRIPTION

Facility Description: NAICS Code: 337122 -- Wood Furniture Manufacturing.

Facility operations include steam generation, lumber drying, woodworking operations, gluing operations, finishing operations, and other processes for manufacturing wood household furniture. Not all components undergo all process steps. Fuel burning equipment includes a 39.2 MMBtu/hr Bigelow wood/coal-fired boiler. It is equipped with an automatic modulating air/fuel system for wood fuel firing and a spreader stoker for coal firing with underfire combustion air. Scrap lumber serves as boiler fuel after processing by a hammer mill hog, with the material being transferred to a silo by a closed loop pneumatic conveying system. Four lumber drying kilns use steam heat to reduce moisture content in lumber. The facility uses a variety of standard woodworking machines which are connected to pneumatic conveying systems for dust and chip removal. These are in turn served by baghouses to control particulate emissions. The company's woodworking equipment has the capacity to process 66,000 board feet of lumber per day. Furniture finishing equipment includes thirteen dry filter back spray booths, five ovens and a flash tunnel. Equipment recently removed includes a reverse roll coater, a single roll printer, an enclosed vacuum coater and a drying oven for water-based applications. Compliant coating materials are used to meet 40 CFR 63 Subpart JJ requirements limiting emissions of volatile hazardous air pollutants (VHAPs). The facility is a PSD minor source.

The Stationary Reciprocating Internal Combustion Engines MACT (40 CFR 63 Subpart ZZZZ) applies to the emergency diesel fire pump as an existing source at a major source of HAPs. The Industrial, Commercial, and Institutional Boilers Major Source MACT standard (40 CFR 63 Subpart DDDDD) applies to boilers B-1 and B-2 as existing sources.

The Plywood and Composite Wood Products Manufacture MACT standard (40 CFR 63 Subpart DDDD) applies to the lumber drying kilns at the facility. However, per 40 CFR 63.2252, the

permittee is not required to comply with the monitoring or recordkeeping requirements of Subpart DDDD or any other requirement in Subpart A except for the initial notification required in §63.9(b). The initial notification was submitted on January 27, 2005. The lumber kilns are listed in the Emission Units table since they do not qualify as insignificant emission units; however, the kilns are not covered by a minor NSR permit.

The Wood Furniture Manufacturing Operations MACT standard (40 CFR 63 Subpart JJ) applies to the finishing operations portion of the facility as an existing source (commenced construction before the December 7, 1995 MACT applicability date).

The facility has one minor New Source Review permit issued on March 22, 1999 (as amended June 19, 2000, January 6, 2005, and March 28, 2012). The application for renewal of this federal operating permit was received on March 16, 2015 and was deemed timely, and administratively complete on June 15, 2015.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emission units at the facility are reflected in the Title V permit on Page 5 (significant units).

EMISSIONS INVENTORY

A copy of the 2014 annual emission update is attached. Emissions are summarized in the following table.

	2014 Criteria Pollutant Emissions in Tons/Year					
	CO	VOC	SO ₂	PM-10	NO ₂	PM _{2.5}
Total	0.9	24.4	1.3	0.8	1.0	0.7

	2014 Hazardous Air Pollutant Emission in Tons/Year		
	Methanol	Toluene	Xylenes
Total	0.59	1.46	0.65

EMISSION UNIT APPLICABLE REQUIREMENTS

The following section discusses requirements for the emissions units at the facility that are subject to Title V permitting. These requirements come from applicable federal requirements. The conditions are not repeated verbatim from the permit. The regulatory authority for each condition is listed in parentheses () below each condition in the permit.

Process Equipment Requirements – Fuel Burning Equipment (B-1 and B-2)

Boiler B-1 was constructed prior to the June 9, 1989 applicability date for the NSPS Dc standards. Boiler B-1 requirements were included in the April 17, 1980 minor NSR permit (as amended 6/19/2000, 1/6/2005, and 3/28/2012). Boiler B-1 is controlled by a multicyclone and the pre-control emissions exceed the major source threshold, therefore Compliance Assurance Monitoring (CAM) requirements currently apply to the unit. Boiler B-1 is subject to MACT Subpart DDDDD (see the MACT DDDDD section), with a compliance date extension submittal request to January 30, 2017. Boiler B-2 is a Wickes distillate oil-fired boiler and is subject to NSPS Dc standards. Boiler B-2 requirements were included in the March 22, 1999 minor NSR permit (as amended 6/19/2000, 1/6/2005, and 3/28/2012). Boiler B-2 is also subject to MACT Subpart DDDDD standards. However, this boiler has not been fired in many years, recently failed a hydrostatic pressure test, and will likely never be used again.

Limitations

- Condition 1** Particulate emissions from the Bigelow wood fuel/coal fired boiler (B-1) are required to be controlled by a Barron Industries 30 tube BASE III 9K15-0606 ST Type B multicyclone, or equivalent, with a rated control efficiency of not less than 87 percent.
- Condition 2** The approved fuels for boiler B-1 are wood and coal, including wood materials generated from the manufacturing processes.
- Condition 3** The approved fuel for the Wickes boiler (B-2) is distillate fuel oil that meets the specifications for fuel oil numbers 1 or 2 under ASTM D396-78.

- Condition 4** Distillate oil consumption in boiler B-2 is limited to 600,000 gallons per year.
- Condition 5** Emissions from the operation of boiler B-1 are limited to 12.7 lb/hr and 53.0 tons/yr for particulate matter (PM), 34.2 lb/hr and 143.6 tons/yr for sulfur dioxide, 22.5 lb/hr and 94.5 tons/yr for nitrogen oxides (as NO₂), and 1.5 lb/hr and 6.3 tons/yr for volatile organic compounds.
- Condition 6** Visible emissions from boiler B-1 are limited to 20 percent opacity except during one six-minute period in any one hour which it is limited to 30 percent.
- Condition 7** Emissions from the operation of boiler B-2 are limited to 0.2 lb/hr and 0.6 tons/yr for particulate matter (PM), 8.8 lb/hr and 21.5 tons/yr for sulfur dioxide, 2.5 lb/hr and 6.0 tons/yr for nitrogen oxides (as NO₂), and 0.6 lb/hr and 1.5 tons/yr for carbon monoxide.
- Condition 8** Visible emissions from boiler B-2 are limited to 10 percent opacity except during one six-minute period in any one hour which it is limited to 20 percent.

Monitoring

- Condition 9** The source is required to conduct weekly visible emission evaluations on boiler B-1 when the boiler is operating. If visible emissions are observed the source must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9.
- Condition 10** The source is required to conduct Compliance Assurance Monitoring (CAM) for boiler B-1 by operating, calibrating and maintaining the multicyclone controlling the boiler in accordance with the approved CAM plan. This includes daily monitoring of pressure drop readings for the multicyclone to determine that the pressure drop is no more than 10% below the established normal range of 0.5 to 3.8 inches of water. External and internal cyclone and also ductwork inspections are required when pressure drop is outside the indicator range as required to correct problems.
- Condition 10 through Condition 17** The source is required to conduct CAM monitoring per 40 CFR 64.6, 64.7, 64.8, and 64.9 requirements.

Recordkeeping

- Condition 18 through 20** The source is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the permit.

MACT Subpart DDDDD –Industrial, Commercial, and Institutional Boilers Major Sources - Fuel Burning Equipment (B-1 and B-2)

Boiler B-1 and B-2 are subject to MACT Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Major Sources. Boiler B-1 is an existing biomass boiler (stoker/sloped grate/others designed to burn kiln-dried biomass fuel), since it was constructed before June 4, 2010 and burns more than 15% biomass on an annual heat input basis. Boiler B-2 is an existing light liquid fuel (distillate oil-fired) boiler since it was constructed before June 4, 2010, and is subject to the compliance date (1/31/2016) of the major source boiler MACT (Subpart DDDDD).

Work Practice Standards, Emission Reduction Measures and Management Practices

Condition 21 The permittee is required operate the source in compliance with the requirements of 40 CFR Part 63 Subpart DDDDD, by the applicable compliance dates as specified in 40 CFR 63.7510.

Condition 22 The permittee is required to meet the work practice standards, emission reduction measures and management practice standards as specified in 40 CFR 63.7500.

General Compliance Requirements

Condition 23 The permittee is required to comply with the General Compliance Requirements specified in 40 CFR 63.7505.

Initial Compliance Requirements

Condition 24 The permittee is required to comply with the Initial Compliance Requirements specified in 40 CFR 63.7510 and 40 CFR 63.7520.

Continuous Compliance Requirements

Condition 25 The permittee is required to demonstrate continuous compliance with the emission limitations, fuel specifications and work practice standards as specified in 40 CFR 63.7515 and 40 CFR 63.7540.

Notifications, Reports and Records

Condition 26 The permittee is required to submit notifications, maintain the records and submit reports as specified in 40 CFR 63.7545, 40 CFR 63.7550, and 40 CFR 63.7555.

Other Requirements and Information

Condition 27 The permittee is required to comply with the applicable General Provisions as specified in 40 CFR 63.7505.

The monitoring, recordkeeping and reporting that is included in these sections meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

Process Equipment Requirements – Fuel Burning Equipment (FP-1)

The 294 hp diesel fired emergency pump (FP-1) is subject to the New and Modified Stationary Sources regulations in 9 VAC 5-50-10 et seq. This diesel fired engine is not included in an underlying minor NSR permit. This diesel fired engine is subject to MACT ZZZZ as an existing source at a major source of HAP (See the MACT ZZZZ section.).

Limitations

Condition 28 Visible emissions from the emergency diesel fire pump (FP-1) are limited to 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.

Condition 29 The approved fuel for the engine (FP-1) is distillate oil.

Monitoring

Condition 30 The source is required to conduct weekly visible emission evaluations on the FP-1 stack. If visible emissions are observed the source must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9.

MACT Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines (FP-1)

The 294 hp emergency diesel fire pump (FP-1) is subject to MACT ZZZZ as an existing source since the source commenced construction before June 12, 2006. Vaughan-Bassett Plant #2 was a major source on the MACT ZZZZ compliance date (May 13, 2013) therefore; the source is subject to the requirements for an engine located at a major source.

Emission and Operating Limitations

Condition 31 The permittee is required to comply with the emission limitations and other

requirements in Table 2c to Subpart ZZZZ of Part 63.

Initial Compliance Requirements

- Condition 32** The permittee is required to operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop its own maintenance plan. If the permittee opts to utilize an oil analysis program the permittee is required to meet the requirements specified in 40 CFR 63.6625(i).
- Condition 33** The permittee is required to have a non-resettable hour meter on the stationary RICE.
- Condition 34** The permittee is required to minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

General Compliance Requirements

- Condition 35** The permittee is required to be in compliance with the emission limitations, operating limitations and other requirements in Subpart ZZZZ that apply to the source at all times and to operate and maintain the affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions as specified in 40 CFR 63.6605.

Continuous Compliance Requirements

- Condition 36** The permittee is required to demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Table 2c to Subpart ZZZZ of Part 63 using the methods in Table 6 to Subpart ZZZZ of Part 63. The permittee is also required to report each instance in which they did not meet each emission limitation or operating limitation.
- Condition 37** The permittee is required to report each instance in which they did not meet the requirements in Table 8 to Subpart ZZZZ of Part 63.
- Condition 38** The permittee is required to meet the requirements in 40 CFR 63.6640(f)(1) through (4) in order for the engine to be classified as an emergency engine. If the permittee does not operate the engine according to those requirements, the engine will not be considered an emergency engine under Subpart ZZZZ and shall meet all requirements for non-emergency engines.

Notifications, Reports and Records

Condition 39 The permittee is required to keep records of notifications, reports, each occurrence and duration of each malfunction of operation or air pollution control equipment, maintenance, actions taken during malfunctions and to show continuous compliance.

Condition 40 If the emergency stationary RICE does not meet the standards in Subpart ZZZZ applicable to non-emergency engines, the permittee is required to keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter.

Condition 41 The permittee is required to comply with the applicable requirements of 40 CFR Part 63 Subpart A as shown in Table 8 to Subpart ZZZZ to Part 63.

The monitoring, recordkeeping and reporting that is included in these two sections pertaining to the emergency diesel fire pump meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

Process Equipment Requirements – Woodworking Operation (WO)

The woodworking equipment is controlled by eight fabric filters and closed loop cyclones on all wood transfer points. The pre-control particulate emissions for the fabric filters are exceed the major source threshold; therefore, CAM does apply. The woodworking equipment is included in the March 22, 1999 minor NSR permit. The equipment is also subject to 9 VAC 5 Chapter 40 Existing Stationary Source regulations in Article 17 – Emission Standards for Woodworking Operations (9 VAC 5-40-2250 et seq.).

Limitations

Condition 42 Particulate emissions from the woodworking operations (WO) are required to be controlled by fabric filter baghouses.

Condition 43 All subsequent transfer of collected material from the woodworking operations (WO) are required to be controlled by a baghouse or completely enclosed transfer system.

Condition 44 Particulate emissions from each particulate emission point of the woodworking process (WO) are limited to 0.05 grains per standard cubic foot of exhaust gas.

Condition 45 Visible emissions from the operation of woodworking equipment through baghouse exhausts of Df-4, Df-5, Df-6, and Df-11 are limited to 20 percent

opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity. Visible emissions from the operation of woodworking equipment through exhausts of baghouses Df-9 and Df-10 shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.

Condition 46 Visible emissions from the operation of woodworking equipment through baghouse exhausts of Df-7 and Df-8 are limited to 5 percent opacity except during startup, shutdown and malfunction.

Monitoring

Condition 47 The source is required to conduct daily visible emission evaluations on each fabric filter stack. If visible emissions are observed the source must conduct a VEE in accordance with EPA Method 9, and either correct the issue so that no visible emissions are observed, or verify compliance with the visible emissions limits noted above with the VEE.

Condition 48 The source is required to conduct Compliance Assurance Monitoring (CAM) for the woodworking operations by operating, calibrating and maintaining baghouses Df-4, Df-5, Df-6, Df-7, Df-8, Df-9, Df-10 and Df-11 in accordance with the approved CAM plan. This includes daily visible emissions checks as noted for condition 45 above, weekly external baghouse inspections with weekly pressure drop recordings, and annual internal baghouse inspections or as also required by evaluation of the pressure drop. The indicator range for pressure drop is to be above 0.3 inches and below 6.4 inches water column for proper operation.

Condition 49 The source is required to conduct CAM monitoring per 40 CFR 64.6, 64.7, 64.8, through and 64.9 requirements.

Condition 55

Recordkeeping

Condition 56 The permittee is required to maintain records of all emission data and operating parameters necessary to show compliance. These records include, but are not limited to: operation and control device monitoring records, scheduled and unscheduled maintenance, operator training, and results of all stack tests, visible emission evaluations and performance tests.

The monitoring, recordkeeping and reporting that is included in this section meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

Process Equipment Requirements – Finishing and Adhesive Operations (FR)

The finishing operations consist of spray booths with spray guns and are included in the March 22, 1999 minor NSR permit. The adhesive operations consist of one spray booth. The finishing and adhesive operations are subject to MACT JJ (See the MACT JJ section). The finishing and adhesive operations are also subject to the New and Modified Stationary Sources regulations (9 VAC 5-50-10 et seq.).

Limitations

- Condition 57** Total VOC emissions from sap/equalizer stains, general stains, wipe stains, shade stains, spatter stains, spray pads and water base basecoat for the spray booths shall not exceed 129.89 tons per year, calculated monthly as the sum of each consecutive 12 month period.
- Condition 58** Total VOC emissions from sealer from the spray booths shall not exceed 60.19 tons per year, calculated monthly as the sum of each consecutive 12 month period.
- Condition 59** Total VOC emissions from lacquer from the spray booths shall not exceed 104.04 tons per year, calculated monthly as the sum of each consecutive 12 month period.
- Condition 60** Total VOC emissions from lacquer thinner from the spray booths shall not exceed 35.53 tons per year, calculated monthly as the sum of each consecutive 12 month period.
- Condition 61** Total emissions from the operation of the furniture finishing operations shall not exceed 25.2 lb/hr and 19.5 tons/yr of particulate matter/PM-10, and 449.7 lb/hr and 329.7 tons/yr of volatile organic compounds.
- Condition 62** Particulate emissions from the spray booths are required to be controlled by fiberglass filters and airless or high volume low pressure (HVLP) equipment to control overspray. Volatile organic compound emissions from the spray booths shall be minimized by the use of airless spray nozzles, or HVLP spray nozzles.
- Condition 63** Visible emissions from each finishing spray booth are limited to 5 percent opacity, except during startup, shutdown and malfunction.
- Condition 64** The source is required to implement work practice standards for the handling of volatile organic compounds in all of the finishing areas of the facility.

Recordkeeping

Condition 65 The permittee is required to maintain records of all emission data and operating parameters necessary to show compliance. These records are to include, but are not limited to: monthly and annual throughput and emissions of particulate matter and VOC for finishing operations, number of hours of operation of the spray booths calculated daily and hourly emissions calculated by dividing the total daily throughput by the corresponding hours of booth operation, annual VOC emissions of each type of coating formulation and material safety data sheets (MSDS) for the same.

MACT Subpart JJ – Wood Furniture Manufacturing Operations

The finishing and adhesive operations are subject to the requirements of 40 CFR Part 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations as an existing source (commenced construction before the December 7, 1995 MACT applicability date). The permit includes all applicable requirements of Subpart JJ. Subpart JJ was revised on November 21, 2011. Revisions for wood furniture manufacturing operations include a 1 percent formaldehyde coating and contact adhesive limit and an alternative 400 pound per 12-month formaldehyde use limit as well as a prohibition on the use of conventional spray guns. The effective date for these requirements is 3 years from the effective date of the standards (November 21, 2014).

Condition 66 The facility is required to be operated in compliance with the requirements of 40 CFR Part 63 Subpart JJ, including future revisions.

Emission Standard

Condition 67 Emission limitations for Volatile Hazardous Air Pollutants (VHAP) include a weighted average VHAP content limit, the requirement to use compliant finishing materials, cleaning operations strippable spray booth coating limits, compliant contact adhesives and formaldehyde limits.

Continuous Compliance

Condition 68 The source is required to show continuous compliance with the VHAP emissions limits.

Testing

Condition 69 Requires that any compliance testing be conducted using the test methods and procedures in Subpart JJ.

Submittals

Condition 70 Requires that all submittals regarding Subpart JJ be sent to both the EPA and DEQ.

Operations and Maintenance

Condition 71 The source is required to meet operational and maintenance requirements including operating and maintaining the facility in a manner consistent with good air pollution control practices for minimizing emissions and correcting malfunctions as soon as practicable.

Work Practice Standards

Condition 72 The source is required to develop and implement the work practice standards outlined in the permit including the following: Work Practice Implementation Plan, Operator Training Course, Inspection and Maintenance Plan, Cleaning and Washoff Solvent Accounting System, Chemical Composition of Cleaning and Washoff Solvents limits, Spray Booth Cleaning, Storage Requirements, Application Equipment Requirements, Line Cleaning, Gun Cleaning, Washoff Operations and Formulation Assessment Plan for Finishing Operations.

Recordkeeping

Condition 73 The source is required to maintain records for emission limit purposes, calculations, the work practice implementation plan, compliance certifications, records associated with the compliance status reports and semiannual reports.

Notification of Compliance

Condition 74 The source is required to submit notifications of compliance that are signed by a responsible official and the notification is required to include the methods that were used to determine compliance, the results of all performance tests, the methods used for determining continuing compliance, the type and quantity of hazardous air pollutants emitted, an analysis demonstrating whether the facility is a major source or an area source and a statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in the permit.

Reporting

Condition 75 The source is required to submit reports demonstrating continuous compliance and any exceedance of a baseline level.

The monitoring, recordkeeping and reporting that is included in these two sections for the finishing operations meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

Wood Drying Kilns Requirements

The wood drying kilns are not currently used in the process operations. They are subject to MACT Subpart DDDD notification and recordkeeping requirements. The wood drying kilns are subject to the Existing Stationary Sources regulations (9 VAC 5-40-10 et seq.).

Limitations

Condition 76 Visible emissions are limited to 20% opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 60% opacity. Visible emissions checks shall be performed on all wood drying kilns for compliance with the limits noted above, at least monthly during periods of normal operation, for not less than two months following the return of the kilns to operation.

MACT Subpart DDDD Requirements

Condition 77 Except where the Title V permit is more restrictive, the permittee shall record and retain all information to determine that the operation of the lumber dry kilns is in compliance with 40 CFR 63 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants, Plywood and Composite Wood Products. These include maintenance records and records of all notifications and reports submitted to comply with the Subpart.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Permit Expiration

These conditions refer to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition 70 and General Conditions 90-93. For further explanation see the comments in previous paragraph (Failure/Malfunction Reporting).

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia has authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

STATE ONLY APPLICABLE REQUIREMENTS

None

FUTURE APPLICABLE REQUIREMENTS

None

INAPPLICABLE REQUIREMENTS

Boiler B-2 is a pollution specific emission unit (PSEU) – (less than 100 tons uncontrolled emissions and CAM requirements do not apply to the unit)

Citation	Title of Citation	Description of Applicability
40 CFR Part 60, Section 60.40c	Subpart Dc – Stds. of Performance for Small Industrial-Commercial-Institutional Steam Generating Unit	Not applicable – To Bigelow boiler B-1, as constructed prior to June 9, 1989.

COMPLIANCE PLAN

In accordance with 40 CFR 63.6(i)(4)(i)(A), Virginia DEQ on August 3, 2015, granted a compliance extension to the Boiler MACT compliance date for Boiler 1 until January 31, 2017. This includes a schedule to commence on site controls installation by August 22, 2016, complete on site controls installation by October 7, 2016, and certify compliance by January 27, 2017.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

A UV roll coat finishing line, the wood sealing garden sprayer (WP-1), and degreasing/parts cleaning (DG-1) are insignificant emission units due to emission levels. The uncontrolled emissions of VOC are each less than 5 tons/year.

CONFIDENTIAL INFORMATION

No confidential information request has been made. All portions of the Title V permit and application are available for public review.

PUBLIC PARTICIPATION

The draft permit was published in *The Gazette* on October 9, 2015. The public comment period ran from October 9, 2015 to November 9, 2015. No comments from the public were received. A copy of the public notice was provided to North Carolina, West Virginia and Tennessee as affected states by postal mail and e-mail on October 9, 2015. The EPA concurrent review period ended on November 24, 2015. Five comments from EPA by Mary Cate Opila were received by e-mail on November 18, 2015. These comments are listed below, coupled with resulting revisions by DEQ to the Title V permit and statement of basis documents.

Comments from EPA Region III on the draft/proposed Title V permit for Vaughan-Bassett Furniture (Registration No. 10332) were received by e-mail from Mary Cate Opila on November 18, 2015. These five comments are addressed below (coupled with DEQ actions in response in italics):

1. The initial EPA comment requests clarification in the statement of basis as to whether the source is a PSD major or minor source.

A sentence has been added to the Source Description on page 2 of the statement of basis

document to note that the source is a PSD minor source.

2. This EPA comment is in regard to condition 10 of the permit, which introduces a CAM plan for the multiclone control device for the Bigelow boiler (B-1) and corresponding particulate matter (PM) emission limits from its NSR permit. EPA notes that the permit condition as written is effective only until the first applicable compliance date for MACT Subpart DDDDD requirements, and that the limits from the NSR permit remain subject to CAM based on 40 CFR §64.2 provisions. The comment continues by stating that if the MACT Subpart DDDDD pollutant limits are more stringent than those required by the underlying NSR permit, then the applicable CAM requirements have the potential to be streamlined. It then concludes by stating that if streamlining is deemed appropriate; a discussion should be included in the statement of basis as to the appropriateness of streamlining, including a comparison of permit limits, and confirmation that either the CAM plan or full implementation of Subpart DDDDD requirements will be in place at all times.

The pertinent PM emissions limit from the NSR permit is 12.7 lb/hr, and the boiler has a maximum 39.2 MMBtu/hr heat input capacity rating. Division of these parameters yields an equivalent limiting value of 0.324 lb/MMBtu for the boiler based on the NSR limit. This is essentially the same as the applicable 0.32 lb/MMBtu limit from the MACT Subpart DDDDD standards. Therefore, in response to the EPA concern, DEQ is eliminating the wording in the permit condition which limits the effectiveness of the CAM provisions to the first applicable compliance date for MACT Subpart DDDDD requirements.

3. Mary Cate's third comment requests clarification as to the MACT Subpart DDDDD biomass boiler type category for the Bigelow boiler (B-1) to be denoted in either the permit or the statement of basis.

Page 6 of the statement of basis document has been amended to note that boiler B-1 is an existing biomass boiler in the stoker/sloped grate/others designed to burn kiln-dried biomass fuel category.

4. The fourth EPA comment notes a format inconsistency in the content of permit condition 44 and its concluding reference, "Compliance with these limits shall be determined as stated in Conditions 43 and 44".

The conclusion of the condition has been corrected to the reference, "Compliance with these limits shall be determined as stated in Conditions 45 and 46".

5. The final comment notes a format inconsistency in the content of permit condition 48, and its references to permit condition 45 in the first column of the table for permit condition 48.

The references in the first column of the table for permit condition 48 have been corrected to refer to condition 47.

The proposed revisions were accepted by EPA in an email from Mary Cate Opila on November 30, 2015.

Attachment: 2014 Annual Emissions Update

Run Date: 04/16/2015 10:39:31 AM

Commonwealth of Virginia
Department of Environmental Quality

Page 1 of 2

Registration Number: 10332

County - Plant ID: 640-00036

Plant Name: Vaughan Bassett Furniture Co Galax Plant #2

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Pollutant Type: All Pollutants

Parameter List

Years: 2014-2014

	CL	CO	HCL	HF	NO2	PB	PM	PM 10
2014	0.000	0.860	0.072	0.008	1.001	0.001	1.637	0.784